

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

January 4, 2019

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

On December 21, 2018, the Court ordered the parties affected by the motion filed by counsel in *Havlish, et al. v. bin Laden, et al.*, 03-cv-9848 (S.D.N.Y.), to meet and confer and propose a briefing schedule by January 4, 2019. *See* ECF No. 4303. Members of the Plaintiffs' Executive Committees ("PECs") and *Havlish* counsel met and conferred on December 31, 2018 followed by additional correspondence; however, an agreement on a briefing schedule could not be reached. The parties are filing as exhibits to this letter the *Havlish* counsel proposal (Exhibit A) and the PECs' proposal (Exhibit B).

Respectfully,

By: /s/ Robert T. Haefele
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For the Plaintiffs' Exec. Committees

cc: The Honorable George B. Daniels, via ECF
All Counsel of Record via ECF